

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA	:	CRIMINAL NO. _____
v.	:	DATE FILED: _____
JARROD SMITH	:	VIOLATIONS:
SHONDA SMITH	:	18 U.S.C. § 371 (conspiracy to commit
	:	bank robbery - 1 count)
	:	18 U.S.C. § 2113(a) (bank robbery - 3
	:	counts)
	:	18 U.S.C. § 2113(a) (attempted bank
	:	robbery - 1 count)
	:	18 U.S.C. § 2 (aiding and abetting)

INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES THAT:

At all times material to this indictment:

1. Wachovia Bank, with branches located at 3070 Airport Road, Bethlehem, Pennsylvania, and 120 College Drive, Allentown, Pennsylvania, among others, was a bank insured by the Federal Deposit Insurance Corporation ("FDIC").

2. Regions Bank, located at 401 South Cedar Street, Tallulah, Louisiana, was a bank insured by the Federal Deposit Insurance Corporation ("FDIC").

3. Bancorp South Bank, located at 3312 Pemberton Blvd., Vicksburg, Mississippi, was a bank insured by the Federal Deposit Insurance Corporation ("FDIC").

4. From on or about April 25, 2008 through on or about May 16, 2008, in the Eastern District of Pennsylvania, and elsewhere, defendants

**JARROD SMITH and
SHONDA SMITH**

conspired and agreed together, to commit an offense against the United States, that is, to knowingly and unlawfully commit bank robbery, in violation of Title 18, United States Code, Section 2113(a).

MANNER AND MEANS

It was part of the conspiracy that:

5. Defendants JARROD SMITH and SHONDA SMITH planned, carried out , or attempted to carry out, the robberies of various banks located in Pennsylvania, Louisiana, and Mississippi.

OVERT ACTS

In furtherance of the conspiracy and to effect the objects of the conspiracy, defendants JARROD SMITH and SHONDA SMITH committed the following overt acts, among others, in the Eastern District of Pennsylvania, and elsewhere:

The Robbery of the Wachovia Bank (Bethlehem, PA)

On or about April 25, 2008:

1. Defendants JARROD SMITH and SHONDA SMITH drove a black Dodge Ram pick-up truck to the Wachovia Bank located at 3070 Airport Road in Bethlehem, Pennsylvania in order to rob the bank.

2. Defendant JARROD SMITH entered the bank and waited in the teller line until his turn. Defendant SMITH then handed the teller a note stating, give the note back with the money and no one gets hurt.

3. Defendant JARROD SMITH then stole approximately \$4,286 in United States currency from the bank.

4. Defendant JARROD SMITH then fled the bank, got into the getaway pick-up truck, in which defendant SHONDA SMITH had been waiting, and the defendants drove away from the bank with the stolen money.

Attempted Bank Robbery of Regions Bank (Louisiana)

On or about May 5, 2008:

5. Defendants JARROD SMITH and SHONDA SMITH drove a red or maroon Pontiac G6 to the Regions Bank, located at 401 South Cedar Street in Tallulah, Louisiana, in order to rob the bank.

6. Defendant JARROD SMITH entered the bank and waited in the teller line until his turn. Defendant SMITH then handed the teller a note stating, this was a robbery and to give him all the large bills and no one gets hurt. The teller closed her drawer and sounded the alarm without giving defendant SMITH any money.

7. Defendant JARROD SMITH then fled the bank and took the note with him, but no money, then got into the waiting getaway car, after which defendant SHONDA SMITH drove them away from the bank.

The Robbery of the Bancorp South Bank (Mississippi)

On or about May 5, 2008:

8. Defendants JARROD SMITH and SHONDA SMITH drove a Pontiac G6 to the Bancorp South Bank, located at 3312 Pemberton Boulevard in Vicksburg, Mississippi, in order to rob the bank.

9. Defendant JARROD SMITH entered the bank and waited in the teller line until his turn. Defendant SMITH then handed the teller a note stating, this is a hold-up, give me all the money, and no one gets hurt.

10. Defendant JARROD SMITH then stole approximately \$2,250 in United States currency from the bank.

11. Defendant JARROD SMITH then fled the bank, got into the waiting getaway car, after which defendant SHONDA SMITH drove them away from the bank.

The Robbery of the Wachovia Bank (Allentown, PA)

On or about May 9, 2008:

12. Defendants JARROD SMITH and SHONDA SMITH drove a Pontiac G6 to the Wachovia Bank, located at 120 College Drive in Allentown, Pennsylvania, in order to rob the bank.

13. Defendant JARROD SMITH entered the bank, waited in the teller line until his turn, and handed the teller a note stating, this is a holdup, give me all your large bills and nobody will get hurt.

14. Defendant JARROD SMITH then stole approximately \$4,400 in United States currency from the bank.

15. Defendant JARROD SMITH then fled the bank and got into the waiting getaway car, after which defendant SHONDA SMITH drove them away from the bank.

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES THAT:

On or about April 25, 2008, in Bethlehem, in the Eastern District of Pennsylvania,
defendants

**JARROD SMITH and
SHONDA SMITH**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Wachovia Bank, located at 3070 Airport Road, Bethlehem, Pennsylvania, of lawful currency of the United States, that is, approximately \$4,286, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT THREE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2008, in Tallulah, in the Western District of Louisiana,
defendants

**JARROD SMITH and
SHONDA SMITH**

knowingly and unlawfully by force and violence, and by intimidation, attempted to take, and aided and abetted the attempted taking, from employees of Regions Bank, located at 401 South Cedar Street, Tallulah, Louisiana, of lawful currency of the United States, belonging to, and in the care, custody, control, management and possession of Regions Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 5, 2008, in Vicksburg, in the Southern District of Mississippi,
defendants

**JARROD SMITH and
SHONDA SMITH**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Bancorp South Bank, located at 3312 Pemberton Blvd., Vicksburg, Mississippi, of lawful currency of the United States, that is, approximately \$2,250, belonging to, and in the care, custody, control, management and possession of Bancorp South Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”).

In violation of Title 18, United States Code, Sections 2113(a) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES THAT:

On or about May 9, 2008, in Allentown, in the Eastern District of Pennsylvania,
defendants

**JARROD SMITH and
SHONDA SMITH**

knowingly and unlawfully by force and violence, and by intimidation, took, and aided and abetted the taking, from employees of Wachovia Bank, located at 120 College Drive, Allentown, Pennsylvania, of lawful currency of the United States, that is, approximately \$4,400, belonging to, and in the care, custody, control, management and possession of Wachovia Bank, the deposits of which were insured by the Federal Deposit Insurance Corporation ("FDIC").

In violation of Title 18, United States Code, Sections 2113(a) and 2.

A TRUE BILL:

GRAND JURY FOREPERSON

**LAURIE MAGID
Acting United States Attorney**